

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MATHEW ZORN,

Plaintiff,

v.

MERRICK GARLAND, *et al.*,

Defendants.

Civil Action No. 4:22-CV-02396

**UNOPPOSED MOTION TO RESET THE DEADLINE TO RESPOND
TO PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

Defendants, Attorney General Merrick Garland, et al., request that the Court reset the Defendants' deadline to file a response to Plaintiff's Motion for Partial Summary Judgment. Plaintiff does not oppose this motion. In further support of this motion, Defendants would show the Court the following:

1. The Court held a status conference with the parties on March 3, 2023. During the status conference, the parties discussed the issue of whether discovery should be permitted in this action. Also at the conference, the parties discussed the deadline for Defendants to respond to Plaintiff's motion for partial summary judgment (Dkt. No. 28). The Court extended Defendants' response deadline to April, 3, 2023, but with the understanding that the deadline would likely need to be extended again if the discovery issue had yet to be resolved.

2. On March 24, 2023, Plaintiff filed a motion for discovery (Dkt. No 31). Defendants' response is currently due on April 14, 2023.

3. Because the discovery issue has yet to be resolved, Defendants' request that the Court extend their deadline for responding to Plaintiff's motion for partial summary judgment to May

3, 2023. If the discovery issue is not resolved by that time, an additional extension may be requested – as discussed at the March 3rd status conference.

DATED: March 30, 2023

Respectfully Submitted,

s/Jimmy A. Rodriguez
Jimmy A. Rodriguez
Assistant United States Attorney
Southern District of Texas
Attorney in Charge
Texas Bar No. 24037378
Federal ID No. 572175
1000 Louisiana, Suite 2300
Houston, Texas 77002
Tel: (713) 567-9532
Fax: (713) 718-3303
jimmy.rodriguez2@usdoj.gov

Of counsel:
Glenn Gray
Attorney
Drug Enforcement Administration
Office of Chief Counsel, Administrative and General Law Section
8701 Morrisette Dr., Springfield, VA 22152

CERTIFICATE OF CONFERENCE

Defendants have conferred with Plaintiff about this motion and Plaintiff is not opposed.

s/ Jimmy A. Rodriguez
Jimmy A. Rodriguez
Assistant United States Attorney

CERTIFICATE OF SERVICE

I certify that on March 30, 2023, a true and correct copy of the foregoing was filed with the United States District Clerk for the Southern District of Texas and electronically served on all counsel of record via the District's ECF system.

s/ Jimmy A. Rodriguez
Jimmy A. Rodriguez
Assistant United States Attorney